

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

## UNITED STATES DISTRICT COURT

for the

District of South Carolina

Division

RCVD - USDC COLA SC  
NOV 4 '24 AM 9:41

Freda Stevens

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Kershaw County School District, Doby's Mills  
Elementary School, Sharon Lewis, individually and in  
her Official Capacity, Shelby Troublefield,  
Individually, and in her Capacity

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

3:24-cv-06298-SAL-SVH

(to be filled in by the Clerk's Office)

## COMPLAINT AND REQUEST FOR INJUNCTION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Freda Stevens
Street Address	10120 Two Notch Road Suite 2 Unit 344
City and County	Columbia, Richland County
State and Zip Code	South Carolina 29223
Telephone Number	803-961-9361
E-mail Address	stevensfreda@ymail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name	Kershaw County School District
Job or Title ( <i>if known</i> )	
Street Address	2029 West Dekalb Street
City and County	Camden, Kershaw County
State and Zip Code	South Carolina 29020
Telephone Number	803-432-8416
E-mail Address ( <i>if known</i> )	

## Defendant No. 2

Name	Doby's Mills Elementary School
Job or Title ( <i>if known</i> )	
Street Address	1964 Fort Jackson Road
City and County	Lugoff, Kershaw County
State and Zip Code	South Carolina, 29078
Telephone Number	803-438-4055
E-mail Address ( <i>if known</i> )	

## Defendant No. 3

Name	Sharon Lewis, individually and in her Official Capacity
Job or Title ( <i>if known</i> )	Principal
Street Address	1964 Fort Jackson Road
City and County	Lugoff, Kershaw County
State and Zip Code	South Carolina, 29078
Telephone Number	803-438-4055
E-mail Address ( <i>if known</i> )	sharon.lewis@kcsdschools.net

## Defendant No. 4

Name	Shelby Troublefield, individually and in her capacity
Job or Title ( <i>if known</i> )	Teacher
Street Address	1964 Fort Jackson Road
City and County	Lugoff, Kershaw County
State and Zip Code	South Carolina, 29078
Telephone Number	803-438-4055

E-mail Address (if known) shelby.troublefiel@kcsdschools.net

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

First Amendment Retailation Claim, Intentional Infliction of Emotional Distress, Breach of Contract, Trespass, Defamation, Invasion of Privacy, Violation of Civil Rights Act, Title VI, Anti-Retaliation Claim

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_.

##### b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

#### 2. The Defendant(s)

##### a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of \_\_\_\_\_.

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the State of *(name)* \_\_\_\_\_ . Or is a citizen of  
*(foreign nation)* \_\_\_\_\_ .

b. If the defendant is a corporation

The defendant, *(name)* \_\_\_\_\_ , is incorporated under  
the laws of the State of *(name)* \_\_\_\_\_ , and has its  
principal place of business in the State of *(name)* \_\_\_\_\_ .  
Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_ ,  
and has its principal place of business in *(name)* \_\_\_\_\_ .

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

The events occurred at Doby's Mills Elementary School in Kershaw County School District.

B. What date and approximate time did the events giving rise to your claim(s) occur?

The events occurred on/about October 2, 2024, September 30, 2024, September 25, 2024, throughout the 2023/2024 school year and 2022/2023 School year.

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- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

On or about September 25, 2024, I filed a complaint against Defendant ST due to her unprofessional and aggressive behavior in front of my three children, ages 10, 8, and 4. This incident caused me significant emotional distress as I feared for my children's safety. I discovered that Defendant ST had posted my child's photo on the school's website and Facebook page without my consent, violating our privacy rights despite my verbal and written refusals. I specifically warned Defendant ST that such a post could endanger my child due to potential threats from individuals in her past.

Following this, I filed complaints with FERPA and the FTC for violations of COPPA and brought my concerns to the attention of the school principal and assistant principal regarding Defendant ST's rude and accusatory behavior regarding my child's enrollment status. I had also requested an evaluation for my daughter, AFS, under IDEA to determine if she qualifies as a child with a disability.

In the previous year, I reported severe bullying incidents involving my older son and filed two state complaints against Defendant KCSD for failing to provide a Free Appropriate Public Education (FAPE) and denying him an Individualized Education Program (IEP). The South Carolina Department of Education (SCDOE) found KCSD liable for certain violations related to these complaints. My oldest son faced bullying over 20 times, including serious threats, which I had to escalate to the district because the principal was unresponsive.

On September 30, 2024, I met with Defendant SL to discuss my request to remove my daughter from Defendant ST's class. During this meeting, I made clear that Defendant SL should not interact with my children, as my daughter ANS was traumatized by the prior incident and could not sleep that night. Despite my request for no physical interaction and to remove AFS from Defendant ST's class, Defendant SL responded in a way that minimized my concerns, stating she would not harm me or my children.

I expressed my feelings of fear and aggression from Defendant ST, which was witnessed by my children and heightened their anxiety. I reiterated that I was speaking hypothetically about self-defense in response to potential threats, emphasizing my protective instincts as a parent.

Subsequently, the school resource officer issued a trespass notice against me at the request of SL and ST, which initially allowed for drop-off and pick-up but was later rescinded, further complicating my ability to fulfill my parental responsibilities given my husband's medical issues.

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#### **IV. Irreparable Injury**

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

1. Loss of rights to access my children's education: Loss of ability to advocate for and participate in my children's education by transporting children to/from school, participate in school activities, and attend awards ceremony/graduation of my children.
2. Health risks - physical strain and psychological harm
3. Intangible Losses -emotional distress, damage to reputation,loss of right to vote on the Day of Election, loss of right to engage in certain activities including - right to vote on election day, right to participate in my children's education and advocate for their needs under 504 Rehabilitation Act and IDEA.

## V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff Freda Stevens seeks a temporary and/or preliminary injunction to prevent Defendants from enforcing a trespass notice issued against her, which would unlawfully restrict her access to Doby's Mills Elementary School (DME) for the purposes of 1) dropping off and picking up her children for daily school attendance, emergencies, early release, or appointments, 2) voting in any future elections on the Day of Election as DME is Plaintiff's polling location, and 3) advocating for the needs of her children that receive special education at DME. I am seeking compensation for the harm I have suffered due to violations of my rights. Specifically, I request \$300,000.00 in actual damages for lost wages, medical expenses, and emotional distress resulting from these violations. Additionally, I am requesting \$3,000,000.00 in punitive damages to hold the responsible parties accountable for their actions and to deter similar conduct in the future. These claims are based on the significant impact these violations have had on my life, including financial strain, defamation, and psychological suffering. I am asking the Court to recognize the seriousness of these issues and provide appropriate relief.

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/03/2024

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Signature of Plaintiff



Printed Name of Plaintiff

Freda Stevens

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address